

Exhibit 24

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 No. 5:16-cv-10444
IN RE: FLINT WATER CASES Hon. Judith E. Levy
5 Mag. Mona K. Majzoub

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9 HIGHLY CONFIDENTIAL
10 VIDEOTAPED DEPOSITION OF MARVIN GNAGY
11 VOLUME I
12 Thursday, December 12, 2019
13 at 9:05 a.m.

14 Taken at: Weitz & Luxenberg PC
15 3011 West Grand Boulevard, Suite 2100
16 Detroit, Michigan 48202

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21 REPORTED BY: CAROL A. KIRK, RMR/CSR-9139
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1 were tasked to do, yes, I was told what the
2 scope was.

3 Q. And you were told that by
4 Mr. Nicholas?

5 A. Yes.

6 Q. Was there any sort of a task list
7 or project plan that listed the various things
8 you intended to accomplish over the course of
9 the project?

10 A. No.

11 Q. So there was no written method of
12 tracking what you were supposed to do, what you
13 had gotten done so far and what you still had to
14 do over the course of the project?

15 A. Those tasks were handled by myself
16 when I was given the basic scope of the work on
17 how to proceed with the investigation and data
18 collection.

19 Q. So did you have some written work
20 plan that identified what you had to do, what
21 you'd accomplished and what you still needed to
22 do?

23 A. No. This is in the normal course
24 of my day-to-day operations. It's well versed

1 and well-known to me.

2 Q. So that's something you just keep
3 in your head?

4 A. Yes.

5 Q. Did anyone check with you at the
6 end of the project to make sure you'd
7 accomplished the full scope of your work?

8 A. No. Again, that's my
9 responsibility as part of the project.

10 Q. So Mr. Nicholas, the project
11 manager, he's not a technical guy, right?

12 A. I don't believe so, no.

13 Q. He's a sales guy?

14 A. Business development.

15 Q. Marketing, sales, generating
16 business, right?

17 A. Primarily. That's part of his
18 duties, yes.

19 Q. Your supervisor on the technical
20 side was Mr. Nasuta, right?

21 A. That's correct.

22 Q. Did Mr. Nasuta do anything to make
23 sure that you had accomplished everything you'd
24 agreed to do on the technical side?

1 A. Mr. Nasuta reviewed weekly
2 summaries of work we had completed each week.

3 Q. Did Mr. Nasuta ever play devil's
4 advocate and ask questions about whether you'd
5 done everything you agreed to do?

6 A. As far as the technical content,
7 no. There were some e-mails regarding making
8 sure we discussed BD of -- if it was possibility
9 to go back to Detroit and it was an option that
10 we were looking at to make sure we expressed
11 those views.

12 Q. Apart from the possibility of
13 switching back to Detroit, do you recall
14 Mr. Nasuta expressing a view on any other
15 technical aspect of your work?

16 A. I don't recall any other comments
17 from him, no.

18 Q. When you're working for a client,
19 it's important that you be on the same page with
20 respect to any limitations on the scope of your
21 work, wouldn't you agree?

22 MR. MCELVAINE: Objection.

23 You can answer.

24 A. Normally you don't start a project

CERTIFICATE

I, Carol A. Kirk, a Registered Merit Reporter and Notary Public in and for the State of Michigan, duly commissioned and qualified, do hereby certify that the within-named MARVIN GNAGY was by me first duly sworn to testify to the truth, the whole truth, and nothing but the truth in the cause aforesaid; that the deposition then given by him was by me reduced to stenotype in the presence of said witness; that the foregoing is a true and correct transcript of the deposition so given by him; that the deposition was taken at the time and place in the caption specified and was completed without adjournment; and that I am in no way related to or employed by any attorney or party hereto or financially interested in the action; and I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Dexter, Michigan on this 27th day of December 2019.



CAROL A. KIRK, RMR, CSR-9139

NOTARY PUBLIC - STATE OF MICHIGAN

My Commission Expires: August 19, 2022.

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